

12-3-138 v6
7-29-98

INTEROFFICE MEMORANDUM
Longview Fibre Company

DATE: July 29, 1998

FROM: David Mendenhall

TO: Alan Whitford

COPIES: TEV RHW WJD TDC SLB

SUBJECT: Environmental Audit at the Seattle Box Plant

On July 23, Steve DuVall and I traveled to the Seattle Box plant for an environmental audit. The trip went very well with very little to report as far as environmental non-compliance is concerned. We took a tour with Sonny Bivins of the plant and looked over their new Beckart waste water treatment system. They and Metro are very happy with this system, in fact, they have been able to use back most if not all of their flexo washup water, after treatment, into the starch make up system. The only water discharge from the plant at this time, is sanitary wastes and boiler blow down. Metro likes the fact that we acted very quickly to install the system and the fact that we are now a "zero discharge" facility. They have been making statements about trying to get a city of Seattle environmental award and possibly a state of Washington award for the plant. We shall see if this happens or not, but it is nice to see one of our plants being considered for an award. If they get one it will be the second plant to receive one this year, as Spanish Fork actually did receive an award from the city early this year.

Another interesting aspect to this Beckart system is that the plant is actually saving considerable money on sewer charges because of the lack of flow to the sewer. Seattle is somewhat unique in that they charge for water flowing into the plant and also for water discharged. The discharged water is also tested for suspended solids and BOD which are then surcharged depending on the amounts "normally" found in the discharge. These charges can add up to a considerable amount of money on a monthly basis. Tom Craig believes we are saving about \$8,000 per month by using the system. We are disposing about 8 tons per month of solids from the Beckart system. This material is going to the Columbia Ridge landfill in Arlington Oregon. ChemWaste Management is handling the disposal of the solids. The \$8,000 savings per month includes the cost of disposal of the solids so, it looks like we will have a pay out on this system at around 2.5 to 3 years. Tom actually stated that the starch system is running better using the water from the Beckart because they have control of the pH going into the starch. The city water they have used in the past had pH problems, it ran anywhere from 6.0 to 9.0. Anyway, they are very happy with the system and glad that we made the decision to install the Beckart.

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Items that we found while there that should be addressed include:

1. At this time the plant has a "draft" waste water permit. Metro did not know that we were going to be a zero discharge facility when they drafted the permit. They need to redraft a permit for us using the knowledge they now have. Until they do this we are subject to the "draft" permit that was issued. We need to stay on them to be sure they give us a new permit as soon as possible.
2. The plant has a good Spill Prevention Control and Countermeasure Plan (SPCC) but it needs to be reviewed (annually) and updated. The current plan does not show the Beckart system or the associated tanks, etc. It should also have a signature page for the plant manager to sign acknowledging the fact that he has reviewed the plan and it is current.
3. This also true of the plants Stormwater Pollution Prevention Plan (SWP3).
4. We need to get back into the quarterly groundwater sampling habit and continue doing this for the next year. We have two wells at the plant site that are left from the remediation of an oil leak/spill back in 1990. I want to try and get this site delisted from the Department of Ecology's list of contaminated sites in the State. In order to do this we have to have testing to prove that the contamination is insignificant.
5. The dumpster that we are temporarily storing the solids from the Beckart system in is covered. At this time rain water is not a problem, but knowing Seattle in the winter it will be soon. The cover on the dumpster cranks up and down for access, but it doesn't close very tightly. We should probably look into putting a roof over it, or trying to find a place inside where it can be placed. I know that space is at a premium in the Seattle plant, but if rainwater starts flowing through this dumpster and the water then flows into a sewer drain we could be in trouble. One other thought is that maybe we could put the solids into plastic bags before dumping into the dumpster. Maybe Beckart knows of a supplier that makes bags that would fit into the hopper before dumping the press.
6. Steve DuVall climbed up onto the roof and noticed that there was a lot of paper dust and corrugated scrap up there. This area of the plant should be routinely cleaned as part of the plants Best Management Practices (BMPs) for the Stormwater Pollution Prevention plan.
7. I would like to have them start sending quarterly Beckart sludge samples to me for analysis. We have done this at each plant that has a Beckart and it is just a good way to keep track of the metals content in the sludge. It also gives us background information, if needed, for the regulatory people or the vendor that is handling the material.

The Seattle plant is doing a good job of trying to stay in environmental compliance. They are located within an area of Seattle that is heavily industrial and because of that, under constant scrutiny by several environmental groups and regulators. They need to stay ahead of the curve on these matters and show that Longview Fibre does care about the environment. Tom and Sonny are doing just that, and they need to continue to do so.

Branch Plant Environmental Audit Follow-up Report

Based on Audit Dated July 23, 1998

LOCATION **Seattle**

Suggested Action and Area of Interest	Progress Toward Completion of Project		Date Completed
	Date of update	Action Taken	
Determine if the plant has or is going to receive a wastewater permit. When the new permit is received, send copy to DNM.		Metro says no new permit coming. They want to wait and see how things run for a few months. Operate for now with what I sent you.	
Review your Spill Prevention Control and Countermeasure (SPCC) and update as necessary.		working on this, will be done by end of Aug.	Aug 31 Done
Review your Stormwater Pollution Prevention Plan (SWP3) and update as necessary.		almost done, complete by Aug 31st	Aug 31
Get bottles for samples and take samples of groundwater for analysis from the two groundwater monitoring wells on-site. Do this at least quarterly for the next year.		will set-up a work order as reminder and do each quarter from \$ now on	
Look into a cover for the dumpster holding the Beckart sludge.		will wait & see on this. Believe cover on dumpster will suffice - no way to "rwy" this area. We do not own the property.	No

Please fill out and return within 30 days to: Longview - Asst. General Council - Attn: W. Jeff Davis

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Branch Plant Audit Follow-up Report for Seattle

Suggested Action and Area of Interest	Progress Toward Completion of Project		Date Completed
	Date of update	Action Taken	

Roof of the plant should be cleaned routinely of corrugated scrap and dust. These are Best Management Practices (BMPs) for your Stormwater Pollution Prevention Plan.		<i>will do this more often.</i>	
Send quarterly samples of Beckart sludge to DNM for analysis.		<i>work order being written - will do on a regular basis.</i>	<i>Done</i>

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